

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Mei L. Wang, Michael Y. J. Wang, Chun Fang
Wang.

Plaintiffs,

v.

CYR International, Inc., Chew Young Roo
America, Inc., CYR USA, Inc., Chew Young
Roo, Inc., Chew Young Roo, Chew Young Roo
Eun Chan Lim, Chew Young Roo, Inc., Chew Young Roo,
Inc., C&Tel, CYR CO., LTD., Sung Soo Park,

Defendants.

Civil Action No.:

07 CV 05462 (BSJ) (FM)

**ANSWER TO DEFENDANT
CHEW YOUNG ROO, INC.'S
COUNTERCLAIMS**

Plaintiffs and Counterclaim-defendants MEI L. WANG, MICHAEL Y. J. WANG, and CHUN FANG WANG, ("Plaintiffs") by their undersigned attorneys, deny any and all liability to Defendant and Counterclaim-plaintiff CHEW YOUNG ROO, INC ("Defendant") and respond to each allegation contained in Defendant's Answer and Counterclaims as follows:

DEFENDANT'S COUNTERCLAIMS

1. Plaintiffs admit the allegations set forth in Paragraph 1 of Defendant's Counterclaims.
2. Plaintiffs admit the first allegation set forth in Paragraph 2 of Defendant's Counterclaims.
3. Plaintiffs do not have knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 3 of the Complaint and, therefore, deny the same.
4. Plaintiffs deny the allegations set forth in Paragraph 4 of Defendant's Counterclaims

5. Plaintiffs deny the allegations set forth in Paragraph 5 of Defendant's Counterclaims.

6. Plaintiffs deny the allegations set forth in Paragraph 6 of Defendant's Counterclaims.

7. Plaintiffs deny the allegations set forth in Paragraph 7 of Defendant's Counterclaims.

D. GENERAL DENIAL

8. Plaintiffs generally deny each and every remaining allegation contained in the Defendant's Counterclaims which have not been previously admitted, denied, or answered. Plaintiffs specifically deny that the Defendant is entitled to the requested relief.

E. AFFIRMATIVE DEFENSES

9. Further answering the Counterclaims of the Defendant, Plaintiffs plead the following affirmative defenses:

FIRST AFFIRMATIVE DEFENSE

10. Defendant's Counterclaims fail to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

11. The equitable doctrine of unclean hands bars the claims alleged by Defendant against Plaintiff.

THIRD AFFIRMATIVE DEFENSE

12. The conduct of Plaintiffs does not warrant the equitable relief sought by the Defendant.

FOURTH AFFIRMATIVE DEFENSE

13. Defendant has suffered no injury of which Plaintiffs' conduct is the proximate cause.

FIFTH AFFIRMATIVE DEFENSE

14. Defendant's claims are barred by the doctrine of waiver, estoppel, laches, acquiescence, or ratification.

F. RESERVATION OF RIGHTS

15. Plaintiffs reserve the right to amend their Answer to Defendant's Counterclaims to raise and rely upon any defenses that become available or apparent during discovery.

Date: June 18, 2008

/s/Darius Keyhani

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this June 18, 2008 I electronically filed and served the within Plaintiffs' Answer to Defendant Chew Young Roo, Inc's Answer with Counterclaim with the Clerk of the District Court using its CM/ECF system, which would then notify all counsel of record including the following counsel for the Defendant Chew Young Roo, Inc. (Korea):

Eric Weinstein, Esq.
FELDMAN WEINSTEIN & SMITH LLP
Yong Hak Kim (Of Counsel)
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Attorneys for Chew Young Roo, Inc.

/s/Dariush Keyhani
Dariush Keyhani